

Annual Maintenance Facility Compliance Review Plan



CTSW-RT-05-999.99.3

**Department of Transportation
Sacramento, California**

August 2005

TABLE OF CONTENTS

1.0	INTRODUCTION	1
2.0	FACILITY COMPLIANCE REVIEW OBJECTIVES	1
3.0	REVIEW METHODOLOGY	1
4.0	REVIEW CRITERIA	2
5.0	RATING GUIDELINES	2
6.0	REVIEW FREQUENCY	3
7.0	COMPLIANCE REVIEW AND REPORTING PROTOCOL	3
8.0	PROGRAM COMMUNICATION	3
8.1	Status Report	3
8.2	Maintenance Program Meetings	3
9.0	REPORTS AND PLANS	3
9.1	Year-End Performance Report	3
9.2	Facility Pollution Prevention Plan (FPPP)	4

ATTACHMENTS

ATTACHMENT 1	Caltrans Maintenance Facility Storm Water Compliance Review Checklist
ATTACHMENT 2	Maintenance Facility Compliance Review Rating Guidelines and Procedures

1.0 INTRODUCTION

The Annual Maintenance Facility Compliance Review Plan (AMFCRP) describes the program that has been implemented by the Caltrans Compliance Review Team for the Maintenance Program. This AMFCRP has been prepared in accordance with the current approved Caltrans *Statewide Storm Water Management Plan (SWMP)*, to comply with the water pollution control requirements of the *National Pollutant Discharge Elimination System (NPDES) Permit for Storm Water Discharges from the State of California, Department of Transportation (Caltrans) Properties, Facilities, and Activities (Order No. 99-06-DWQ), Permit No. CAS000003* (Caltrans Permit). The AMFCRP will be updated to be consistent with the approved SWMP and its revisions. The AMFCRP provides Caltrans with the information necessary to ensure that the appropriate level of storm water pollution control is being achieved at Caltrans maintenance facilities. This AMFCRP will be made available to the State Water Resources Control Board (SWRCB) and Regional Water Quality Control Boards (RWQCBs).

2.0 FACILITY COMPLIANCE REVIEW OBJECTIVES

Compliance Review Team activities will focus on achieving the following objectives:

- Evaluate compliance of maintenance facilities as defined in Appendix A and Sections 8.3 – 8.4 of the SWMP.
- Report compliance status to Caltrans management.
- Evaluate Best Management Practice (BMP) implementation trends and suggest areas for improvement and new BMP implementation methodologies.

This AMFCRP describes the compliance evaluation criteria, protocols, and reporting methods of the compliance review program. The key elements of the AMFCRP include:

- Maintenance facility review methodology (Section 3.0)
- Maintenance Facility review criteria (Section 4.0)
- Maintenance Facility rating guidelines (Section 5.0)
- Maintenance facility review frequency (Section 6.0)
- Compliance review and reporting protocol (Section 7.0)
- Feedback and program improvement (Section 8.0)

3.0 REVIEW METHODOLOGY

Maintenance facilities will be reviewed for overall effectiveness of their storm water pollution prevention implementation and their potential for pollutant discharge. The Compliance Review Team will review the implementation of Maintenance BMPs in accordance with the Caltrans SWMP. The Maintenance BMPs to be reviewed will generally include the following:

- Building and Grounds Maintenance
- Storage of Hazardous Materials (Working Stock)
- Material Storage Control (Hazardous Waste)
- Outdoor Storage of Raw Materials
- Vehicle and Equipment Fueling
- Vehicle and Equipment Cleaning
- Vehicle and Equipment Maintenance and Repair
- Aboveground and Underground Tank Leak and Spill Control

- Additional maintenance BMPs identified in the SWMP may be applicable on a facility-specific basis.

The compliance reviews will be conducted year-round. Compliance will be documented on a standardized Caltrans Maintenance Facility Storm Water Compliance Review Checklist (Compliance Checklist) presented in Attachment 1. The Compliance Checklist addresses the general Maintenance BMPs that apply to a majority of Caltrans operations at maintenance facilities. In addition, the Compliance Review Team will review the Caltrans Maintenance Facilities Pollution Prevention Plans (FPPPs) for each maintenance facility as part of the review process.

4.0 REVIEW CRITERIA

Compliance Reviews will be conducted at a minimum of 20 percent of the maintenance facilities per District per year. The Compliance Review Team will notify each District Maintenance Storm Water Coordinator (DMSWC) of the tentative review dates scheduled for the District. Each DMSWC will then be responsible for providing 48 hours notice in advance of the review to management at the maintenance facilities in the District.

5.0 RATING GUIDELINES

As a result of the compliance review, each facility will be given a rating that consists of a numeric and a letter component according to the following guidelines.

Part One – Maintenance Facility Compliance (Numeric Designation)

1. The facility is in compliance with SWMP requirements. Revisit will be conducted during the next cycle.
2. Minor deficiencies noted. The facility is in compliance with SWMP requirements. Revisit will be conducted during the next cycle.
3. Major deficiency noted that require prompt correction. A re-visit will be conducted within two weeks. District Maintenance Storm Water Coordinator and Headquarters Maintenance Storm Water personnel will be notified.
4. Critical deficiency noted that require immediate correction. A re-visit will be conducted within one week. District Maintenance Storm Water Coordinator, District Managers, Environmental, and Headquarters Maintenance Storm Water personnel will be notified.

Part Two – Overall Effectiveness of BMPs (Letter Designation)

- A. The facility's overall water pollution prevention effort is highly effective. Non-storm water pollutants are substantially controlled.
- B. The facility's overall water pollution prevention effort is moderately effective. Non-storm water pollutants are partially controlled.
- C. The facility's overall water pollution prevention effort is ineffective. Non-storm water pollutants are not controlled.

6.0 REVIEW FREQUENCY

Only facilities to which one or more crews report, will be reviewed. The review frequency will be based on reviewing each maintenance facility within a 5-year cycle. Based on the ratings from the reviews, revisits may be necessary prior to the next cycle. Facilities that receive a rating of 1 or 2 will not be revisited until all facilities are reviewed within the cycle. Facilities receiving a rating of 3 or 4 (major or critical deficiencies) will be revisited to document that improvements have been made within two weeks and one week, respectively.

7.0 COMPLIANCE REVIEW AND REPORTING PROTOCOL

Compliance review reports, revisit reports, and rating results, including completed Compliance Checklist summary pages, will be provided to the facility Maintenance Supervisor or designee and the DMSWC that attends the review, before leaving the maintenance facility. District Maintenance Superintendents and Managers are invited to participate in reviews and revisits. If after a revisit from a major or critical rating, where no improvement is seen, notice will be given to District Maintenance Managers and DMSWC via e-mail, and another revisit by both District and Headquarters Maintenance Storm Water personnel will be scheduled for one week later. The DMSWC or NPDES Coordinator (this duty may vary in each district) will immediately notify the RWQCB pursuant to the SWMP.

8.0 PROGRAM COMMUNICATION

8.1 Status Report

A monthly status report summarizing compliance review activities will be provided to Caltrans Division of Environmental Analysis – Storm Water and Division of Maintenance – Storm Water. The status report will include an up-to-date listing of all maintenance facility compliance ratings, a description of all facilities reviewed and other issues of note.

8.2 Maintenance Program Meetings

At the request of District and Headquarters personnel, District Maintenance Managers, or DMSWCs, the Compliance Review Team will present a briefing on field observations and discuss the findings of recent compliance reviews. These briefings will serve as a management tool for the District and will provide feedback to Headquarters Maintenance Storm Water personnel for storm water program improvement. In addition, the Compliance Review Team will be available to participate in the quarterly Maintenance Storm Water Coordinator meetings to discuss the results and findings of the compliance reviews.

9.0 REPORTS AND PLANS

9.1 Year-End Performance Report

A Year-End Performance Report will be prepared to summarize the results of the program from July 1 through June 30 reporting period on an annual basis. The report will include the following information:

- An explanation of facility selection and review criteria for facilities inspected.
- Details of continuous training,
- An overall performance assessment, including a compilation of all ratings, BMP implementation, and a comparison with the results from the previous reporting period.

- BMP implementation trends, including observations of good water pollution control practices and challenges encountered.
- A list of deficiencies and recommended approved BMP corrective actions to improve water pollution control.
- An expanded review log that identifies the entire compliance review history at each facility.

9.2 Facility Pollution Prevention Plan (FPPP)

- A Facility Pollution Prevention Plan (FPPP) has been developed for each Caltrans Maintenance Facility as required by the Department Storm Water Management Plan (SWMP). The FPPP describes the activities conducted at the Maintenance Facility and the BMPs implemented to reduce the pollutants in storm water runoff from these facilities. Maintenance Supervisors conduct and document monthly inspections of the facility to monitor the implementation and adequacy of the BMPs. These inspection reports are maintained in the FPPP for a minimum of three years. Recommendations to update the FPPP, including recordkeeping, will be documented in the inspection report or recommend new FPPP will be prepared for facilities that currently do not have an FPPP onsite.

ATTACHMENT 1

Caltrans Maintenance Facility Storm Water Compliance Review Checklist

Caltrans Maintenance Site Storm Water Compliance Review Checklist				
District:		Cost Center:		Overall Site Rating*
Site Name:				
Address:			Date:	
Facility Supervisor:		Inspector(s):		
Facility Supervisor Phone No:		Phone No:		
Attendees:		Notification Contact:		
		Notification Date:		
Review Type: Initial Revisit		All Storm Drains Stenciled: Yes No N/A		
FPPP Available On Site: Yes No		Monthly Self Inspection Documented: Yes No		
Structural Treatment BMPs for Facility: Yes No Type:				
BMP	CRITERION	BMP RATING*	COMMENT NUMBER(S)	
Building and Grounds Maintenance	Are the building and grounds maintained to reduce the potential for discharge of pollutants to the storm water drainage system?			
Storage of Hazardous Materials (Working Stock)	Are hazardous materials (working stock) properly managed to reduce the potential for discharge of pollutants to the storm water drainage system?			
Material Storage Control (Hazardous Waste)	Are hazardous wastes properly managed to reduce the potential for discharge of pollutants to the storm water drainage system?			
Outdoor Storage of Raw Materials	Are practices implemented to adequately reduce the potential for the discharge of products from outdoor raw materials storage sites to the storm water drainage system and to minimize exposure to storm water?			
Vehicle and Equipment Fueling	Are practices implemented to minimize contact between storm water and vehicle fluids at fueling areas?			
Vehicle and Equipment Cleaning	Are practices implemented that minimize contact between storm water and the equipment washing area and ensure that wash water is not discharged to the storm drainage system?			
Vehicle and Equipment Maintenance and Repair	Are practices implemented that reduce the discharge of potential pollutants from areas in which vehicle maintenance and repair activities are conducted and minimize contact between storm water and activity areas and products used?			
Aboveground and Underground Tank Leak and Spill Control	Are adequate practices implemented to reduce the discharge of potential pollutants to the storm drainage system from aboveground and underground storage tanks?			
*Description of Rating				
1	The site is in compliance with the Storm Water Management Plan (SWMP).			
2	Minor deficiencies noted. The site is in compliance with the SWMP.			
3	Major deficiency. Prompt correction required. A re-visit will be conducted _____			
4	Critical deficiency. Immediate correction required. A re-visit will be conducted _____			
A	Overall implementation of BMPs is highly effective.			
B	Overall implementation of BMPs is moderately effective.			
C	Major and critical deficiencies in overall implementation of BMPs.			

ATTACHMENT 2

Maintenance Facility Compliance Review Rating Guidelines and Procedures

Maintenance Facility Compliance Review Rating Guidelines and Procedures

The numeric rating criteria are as follows:

- 1 Rating** The facility is in compliance with Storm Water Management Plan (SWMP) requirements. Revisit will be conducted during the next cycle.
- No observed activities that contribute to a non-storm water discharge.
- 2 Rating** Minor deficiencies noted. The facility is in compliance with SWMP requirements. Revisit will be conducted during the next cycle.
- Minor housekeeping problems (e.g., some areas need sweeping, some litter, small fluid spots need cleanup and removal).
 - Minor waste management and storage problems (e.g., solid waste storage inadequate or exposed during rainfall).
- 3 Rating** Major deficiency noted that require prompt correction. A re-visit will be conducted within two weeks. District Maintenance Storm Water Coordinator and Headquarters Maintenance Storm Water personnel are notified.
- Potential non-storm water discharge.
 - Evidence of a prior non-storm water discharge that has not been completely cleaned up.
 - Multiple deficiencies described in the “2” rating, which cannot be corrected immediately.
- 4 Rating** Critical deficiency noted that require immediate correction. A re-visit will be conducted within one week. District Maintenance Storm Water Coordinator, District Managers, Environmental, and Headquarters Maintenance Storm Water personnel are notified.
- Observed non-storm water discharge.

Note: For ratings of 3 or 4, comments are required on the Review Summary Sheet describing the deficiencies.

The letter rating criteria are as follows:

- A Rating** Overall implementation of BMPs is highly effective.
- BMPs are implemented and maintained in good condition.
 - Some minor deficiencies with the implemented BMPs
- B Rating** Overall implementation of BMPs is moderately effective.
- Some BMPs are not fully or properly maintained.
 - Improper implementation of some BMPs.
 - Some BMPs have not been installed.
- C Rating** Major and critical deficiencies in the overall implementation of BMPs.
- Many BMPs improperly installed.
 - BMPs have failed due to non-maintenance.
 - Many BMPs not implemented or installed.